

### REMARKS

This paper is responsive to a Final Office Action dated October 14, 2004. Prior to this amendment claims 1-34 were pending. Claims 1-34 remain pending.

The Office Action has rejected claim 1 under 35 U.S.C. 102(e) as anticipated by Goiffon et al. ("Goiffon"; US 6,453,312). Specifically, the Office Action states that, at col. 5, ln. 37-40, Goiffon discloses search syntax help that is automatically supplied in response to a search request. The Office Action also states that Figs. 4 and 5 of Goiffon show the display of search syntax characters.

The *Response to Arguments* Section of the Office Action states that the Applicant is incorrect in asserting that supplying syntax help is not the same as automatically inserting operators between search terms. The Office Action goes on to say that Goiffon's process automatically supplies additional related search terms. However, this analysis fails to appreciate that there is a difference between "search syntax characters" and "search terms". A "search term" is the subject of a search, i.e., "Uniforms". Search syntax characters are the operators that join search terms. Using the above example, a search can be made as follows: "War" AND "Uniforms". In this example, "War" and "Uniforms" are the search terms and the word "AND" is a search syntax character. Keeping this distinction in mind, it can be seen that Goiffon's Figs. 4 and 5 describe the search term "bugs". The figures do not display any search syntax characters.

The claimed invention is not concerned with supplying alternate, additional, or related search terms. Rather, claim 1 recites supplying a list of supported search syntax characters. The claimed invention specification states the search syntax characters are operators and connectors (page 6, ln. 19-21). Several examples of search syntax characters are presented as examples.

In summary, Goiffon's process of automatically inserting operators is not the same as providing a display of supported operators. Further, the provision of related search terms has nothing to do with the provision of operators. Since Goiffon does not describe the claimed invention limitation of supplying search syntax help that includes a display of support syntax characters, he cannot anticipate. The Applicant respectfully requests that the rejection be removed.

The Final Office Action has rejected claims 2-34 under 35 U.S.C. 103(a) as unpatentable with respect to Shanahan et al. ("Shanahan"; US 672,090) in view of Goiffon. The Office Action acknowledges that Shanahan fails to describe a system that systematically aids the user in building an enhanced search inquiry. The Office Action further states that it would have been obvious at the time of the invention to incorporate an advanced systematic step to develop a query, as disclosed by Goiffon, with Shanahan's system of restructuring a query, to disclose the claimed invention.

With respect to three requirements needed to establish a *prima facie* case of obviousness (MPEP 2143), the Applicant still respectfully contents that there is no motivation to combine the references, for the reasons supplied in the previous Office Action response. The *Response to Arguments* Section of the Final Office Action states

that there is a logic to combine the Goiffon and Shanahan references because "Goiffon aids the user in developing an exclusive query to search a storage unit, and Shanahan is related for utilizing methods ... for retrieval data files in a storage unit..." However, this analysis is incomplete. Even if there is a motivation to combine based upon the Examiner's above-mentioned analysis, the motivation is irrelevant unless the combination suggests a modification (to one of references) that would make the claimed invention obvious. Alternately stated, even if Goiffon and Shanahan could be combined on the basis that Shanahan suggests search algorithm modifications to Goiffon, this combination has nothing to do with providing a display of supported search syntax characters. The test is not just whether the references can be combined, but rather, is there an aspect to the combination that suggests the claimed invention. Since the claimed invention is not concerned with search algorithms, the Applicant respectfully submits that the combination of references do not suggest a modification that makes the claimed invention obvious.

With respect to the third *prima facie* requirement, the combination of references does not teach or suggest all the limitations of claims 1 and 18. The *Response to Arguments* Section of the Office Action states that the Applicant is incorrect in asserting that Goiffon never describes a help popup window that automatically appears in response to a search request. The Examiner uses Fig. 6 to support his argument. However, Fig. 6 clearly shows a list of related *search terms*. Alternately stated, Fig. 6 does not show a list of supported search syntax terms or operators.

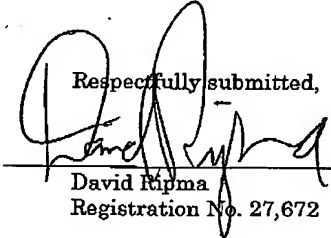
Shanahan adds nothing related to subject of providing syntax help or syntax characters. As noted above, Goiffon either automatically

inserts operators between terms, or suggests alternate search terms. However, Goiffon never displays a list of supported search syntax operators. Therefore, the combination of Shanahan and Goiffon does not disclose the limitations of displaying a list of supported search syntax characters in response to formulating a search request (claim 1). Neither does the combination of references describe the limitation of a search syntax popup window that appears in response to selecting an edit box (claim 18). Claims 2-17, dependent from claim 1, and claims 19-34, dependent from claim 18, enjoy the same distinctions from the cited prior art. The Applicant respectfully requests that the rejections be removed.

It is believed that the application is in condition for allowance and reconsideration is earnestly solicited.

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